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*Counsel for Defendant  
 MarinHealth Medical Center*

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

C.M., individually, and on behalf of all others  
 similarly situated,

Plaintiff,

vs.

MARINHEALTH MEDICAL CENTER,

Defendant.

Case No.: 3:23-cv-04179-WHO

*Assigned to Hon. William H. Orrick*

**JOINT STIPULATION TO STAY CASE  
 AND NOTICE OF SETTLEMENT**

Complaint Filed: August 16, 2023  
 FAC Filed: March 21, 2024  
 Trial Date: August 3, 2026

1 Plaintiff C.M. (“**Plaintiff**”) and Defendant MarinHealth Medical Center (“**Defendant**,” and  
2 together with Plaintiff, the “**Parties**”) by and through their respective counsel, jointly request that  
3 the Court stay this action for nine (9) months pending settlement finalization and approval and  
4 hereby stipulate:

5 WHEREAS, on August 16, 2023, Plaintiff C.M. filed their original Complaint against  
6 MarinHealth Medical Group, Inc.;

7 WHEREAS, on March 21, 2024, Plaintiff C.M. filed their First Amended Complaint to  
8 include Defendant, MarinHealth Medical Center;

9 WHEREAS, on March 7, 2024, the related action was filed in Marin County Superior Court  
10 titled *John Doe I and John Doe II v Marin Health Medical Center*, Marin County Superior Court  
11 Case No. CV0002218 (“*Doe Action*”) which involves the same subject matter and substantially  
12 similar questions of law and fact;

13 WHEREAS, on October 8, 2024, the Parties, along with Plaintiffs in the *Doe Action*,  
14 attended a global mediation with mediator, Hon. Wayne R. Andersen (Ret.), where Parties in this  
15 instant action and the *Doe Action* reached a settlement in principle on a class wide basis (the  
16 “Settlement”);

17 WHEREAS, Defendant is a California entity transacting in California and more than two-  
18 thirds of the class are residents of California;

19 WHEREAS, Plaintiffs in the *Doe Action* will file an amended complaint to include Plaintiff,  
20 C.M. and shortly thereafter Plaintiffs will file a Motion for Preliminary Approval of Class Action  
21 Settlement in the *Doe Action*;

22 WHEREAS, the Parties have further met and conferred and believe that a stay of the  
23 proceedings before this Court for nine (9) months pending completion of the settlement documents,  
24 and filing and resolution of a motion for preliminary approval of the nationwide class settlement in  
25 the *Doe Action* would conserve the resources of the Parties and serve the interests of judicial  
26 economy;

WHEREAS, although the terms of the proposed settlement will remain confidential until the preliminary approval motion is filed in *Doe Action*, the Parties are prepared to update the Court regarding the terms of the settlement in principle in the interim should the Court desire them to do so;

WHEREAS, following grant of preliminary approval in the *Doe Action*, the Parties will so inform this Court and, if necessary, will seek a further stay of the present action pending completion of the final settlement approval process in *Doe Action*;

THEREFORE, for good cause shown, the Parties stipulate and agree, subject to the Court's approval, that this action be temporarily stayed until October 14, 2025, and that all pre-trial and trial deadlines are vacated so the parties may finalize and document the terms of the settlement and file for and obtain preliminary approval of the settlement.

DATED: January 23, 2025

**CLARKSON LAW FIRM, P.C.**

/s/ Yana Hart

Yana Hart, Esq.

Ryan Clarkson, Esq.

Tiara Avanness, Esq.

DATED: January 23, 2025

**ALMEIDA LAW GROUP LLC**

/s/ Matthew Langley

John R. Parker, Esq.

Matthew Langley, Esq.

DATED: January 23, 2025

**CONSTANGY, BROOKS, SMITH &  
PROPHETE, LLP**

/s/ David Yudelson

David Yudelson, Esq.

Sydney Wright, Esq.

**ATTESTATION UNDER LOCAL RULE 5-1(i)(3)**

Pursuant to Civil Local Rule 5-1(i)(3), the undersigned filer hereby attests that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

DATED: January 23, 2025

**CLARKSON LAW FIRM, P.C.**

/s/ Yana Hart

Yana Hart, Esq.

**[PROPOSED] ORDER**

The Court having reviewed and considered the Parties’ Joint Stipulation to Stay Case and Notice of Settlement, and good cause appearing, hereby orders:

1. The Class Certification and Pre-Trial Schedule deadlines are hereby VACATED.
2. This action is temporarily stayed until October 14, 2025.

**IT IS SO ORDERED.**

DATE: \_\_\_\_\_

\_\_\_\_\_  
William H. Orrick  
United States District Judge